1	PHILLIP TALBERT		
1	United States Attorney		
2	MATHEW W. PILE, WSBA No. 32245		
3	Associate General Counsel		
3	Office of Program Litigation, Office 7		
4	Social Security Administration		
_	MARY TSAI, CSBN 216963 Special Assistant United States Attorney		
5	6401 Security Boulevard		
6	Baltimore, MD 21235		
7	Telephone: 510-970-4864		
7	Facsimile: (415) 744-0134		
8	E-Mail: mary.tsai@ssa.gov		
	Attorneys for Defendant		
9	UNITED STATES DISTRICT COURT		
10			
11	EASTERN DISTRICT OF CALIFORNIA		
	FRESNO DIVISION		
12	1122110	211201	
13		G N 124 00561 WEG DAM	
13	JOEL CORDERO FLORES,	Case No.: 1:24-cv-00561-KES-BAM	
14		STIPULATION FOR AN EXTENSION OF	
15	Plaintiff,	TIME; [PROPOSED] ORDER	
	vs.		
16	5		
17	COMMISSIONER OF SOCIAL SECURITY,		
18	Defendant.		
19			
20	Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the		
21	parties, through their respective counsel of record, that the time for Defendant to respond to		
22	Plaintiff's Opening Brief be extended seven (7) days from November 14, 2024, up to and		
23	including November 21, 2024. This is the parties' third stipulation for an extension of the		
24	Court's Scheduling Order, and Defendant's first extension.		
25	This is Defendant's first request for an extension, and it is made with good cause. This		
26	case was recently reassigned to undersigned counsel for Defendant, along with three other brief		

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all of which are due in November 2024. In total, Moreover, counsel already has five briefs due

by approximately mid-November. Thus, Defendant requires an extension in this case, and may

Case 1:24-cv-00561-KES-BAM Document 19 Filed 10/24/24 Page 2 of 2

1	require extensions in other cases, and requests this extension in good faith and with no intent to		
2	delay these proceedings unnecessarily.		
3	The parties further stipulate that the Court's Scheduling Order shall be modified		
4	accordingly.		
5			
6		Respectfully submitted,	
7	Dated: October 23, 2024	/s/ Jonathan Omar Pena*	
8		JONATHAN OMAR PENA	
9		Attorney for Plaintiff *as authorized via e-mail on October 23, 2024	
10		as aumorized via c man on october 25, 2021	
11	Dated: October 23, 2024	PHILLIP TALBERT	
12		United States Attorney	
		MATHEW W. PILE Associate General Counsel	
13		Office of Program Litigation, Office 7	
14		Social Security Administration	
15	By:	/s/ Mary Tsai	
16		MARY TSAI	
17		Special Assistant U.S. Attorney	
18		Attorneys for Defendant	
19			
	<u>ORDER</u>		
20	Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an		
21	extension, up to and including November 21, 2024 to respond to Plaintiff's Opening Brief. The		
22	remaining dates in the Court's Scheduling Order are modified accordingly.		
23			
24	IT IS SO ORDERED.		
25	Dated: October 24, 2024	/s/Barbara A. McAuliffe	
26		UNITED STATES MAGISTRATE JUDGE	
27			
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